UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

EDDYSTONE RAIL COMPANY, LLC,

Plaintiff/Counter-defendant,

v.

BRIDGER LOGISTICS, LLC, et al.,

Defendants,

: No. 2:17-cy-00495-JDW

BRIDGER LOGISTICS, LLC, et al.,

Defendants/Counterclaimants.

:

DECLARATION OF RACHEL A. BECK, ESQ., IN SUPPORT OF MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL COUNTS OF PLAINTIFF'S FIRST AMENDED COMPLAINT

- I, Rachel A. Beck, pursuant to 28 U.S.C. § 1746, hereby state and declare:
- 1. I am an attorney at the law firm of Faegre Drinker Biddle & Reath, LLP ("Faegre Drinker"), counsel of record for Defendants in the above-captioned matter.¹ I am an attorney duly admitted to practice in the State of California and the District of Columbia, and I am admitted *pro hac vice* in the above-captioned matter.
 - 2. I am over the age of 18 and competent to testify as to the matters set forth herein.
- 3. Attached as **Exhibit 1** to Defendants' Statement of Material Undisputed Facts ("SUMF"), is a true and correct copy of excerpts from the November 30, 2018 deposition of Vincent Paradis.

[&]quot;Defendants" include Ferrellgas Partners, L.P.; Ferrellgas, L.P.; Bridger Logistics, LLC; Bridger Administrative Services II, LLC; Bridger Marine, LLC; Bridger Rail Shipping, LLC; Bridger Real Property, LLC; Bridger Storage, LLC; Bridger Swan Ranch, LLC; Bridger Terminals, LLC; Bridger Transportation, LLC; Bridger Energy, LLC; Bridger Leasing, LLC; Bridger Lake, LLC; J.J. Liberty, LLC; and J.J. Addison Partners, LLC.